

Bankruptcy Case No. 08-1789 (BRL)

BERNARD L. MADOFF INVESTMENT SECURITIES LLC  
In Liquidation December 11, 2008

OPPOSITION TO TRUSTEE'S DETERMINATION OF CLAIM, BURNETT H RADOSH, Claimant  
Claim # 014898

I RESPECTFULLY REQUEST THAT NO ACTION BE TAKEN ON THIS OPPOSITION UNTIL THE FINAL DECISION ON APPEAL OF THE CICO vs. LSM ISSUE NOW BEFORE THE US SECOND CIRCUIT COURT OF APPEALS. If CICO wins whether or not Burnett Radosh is a customer of BLMIS under SIPA is a moot point. Also for that reason, Claimant does not wish to burden either the Bankruptcy Court or the Trustee with copies of all possibly pertinent documents at this time, as they number well into the thousands and nearly fill a standard 4-drawer filing cabinet.

RADOSH PARTNERS (RP) was formed in 1993 for six named persons : the children and grandchildren of Louis + Esther Radosh, both then deceased, as the six descendants were to receive the proceeds of a BLMIS trust account started by Louis + Esther. All six were named 'RADOSH': Burnett + Edward (sons and only children of Louis + Esther), Alaric and Jeremy (sons of Burnett and his wife Katherine), Lee and Laura (son and daughter of Edward and his wife Fran). The sole purpose of RP was to allow each of the six the option of keeping the inherited proceeds invested with BLMIS. Moreover, when RP was formed, it was done in actual coordination with BLMIS. (Copy of letter to letter to BLMIS, 3 JUN 93, attached hereto as Incl. 1).

RP is a registered Fictitious Name, not a registered Partnership, in the State of Florida. The original registration named the six partners all as 'owners'. Subsequently children of Lee + his wife Jodi, and Laura and her husband, Tausig, were added as owners, as was Katherine's mother, Catherine Koenig. Edward dropped out as a partner, but later returned for a while as Edward A Radosh Profit Sharing Plan. Catherine Koenig passed away, her share going equally to her grandsons, Alaric and Jeremy. Several amendments to the Fictitious Name registration reflected the changes in the composition of RP.

Fictitious Name registrations in Florida are public records, easily accessed on-line. On request we can provide hardcopy of all of our filings with the Florida Secretary of State, and if this matter comes to hearing we may present them in evidence.

Each member of RP, each owner, made his/ her own RP/Madoff account investment decisions. The main function of the so-called "General Partner", entirely clerical, was to consolidate the individual members withdrawals and new investments, and send the net sum to BLMIS or ask for a BLMIS withdrawal check. Copies of two letters of the "GP" to BLMIS requesting withdrawal are attached here as exemplars (Incl 2 + 3), but all are now available on request and all may be offered into evidence when this comes to a hearing. BLMIS proceeds were distributed by the "GP" to the member/owners who had requested them. The GP also kept a record of all transactions, internal and external, and filed yearly 1065 Forms with the IRS as a pass-through entity "investment club" code 523900, and sent 1065 K-1s to all of the members. All of these records are now available to the Court or the Trustee upon request and may be entered into evidence at the hearing.

The "GP" made no investment decisions except for his own personal share as one of the owners.

RP owners never met to make organizational investment decisions regarding it's sole investment, the BLMIS account , and no such decisions were ever made. RP was merely a pass-through for the decisions of the individual owners.

RP has never had formal documentation between the owners., notwithstanding the "GP" originally planned to come up with such. There is a series of letters from the "GP" to all the owners that reflect the

informal framework, 138 in all, but sent to each owner with different investment data computed for each owner, so the total of filed letters is well over 1,000. This includes a copy of the blank format for that letter as well as the copy of the letter sent to each owner. A complete set for one letter, and two formats for other letters are attached hereto as exemplars (Incls 4, 5 + 6)), but, of course, all are now available to the Court and to the Trustee on request, and when and if this comes to a hearing, all may be offered into evidence.

Claimant, of course, filed annual 1040s (jointly with wife Katherine), and paid tax on all their BLMIS profits reported per their K-1. After the December 2008 revelation, they used the Safe Harbor method for some IRS relief. All the Claimant's IRS documentation is on file, and may be presented at the hearing. It is available now on reasonable request of the Trustee.

It is understood, of course, that if the customer status of the individual owners is recognized for payment of their LSM claims vs. SIPC, no SIPC payment will be made to RP. We do not seek dual coverage, just full coverage.

Claimant's account in RP originally was in his name only, but later wife Katherine joined him and the account belonged to both, JTWRROS. A major addition to their RP/ Madoff account came from their personal BLMIS account which was JTWRROS. Accordingly, there were also separate SIPC claims filed in the names of Burnett + Katherine JTWRROS and Katherine. Once again, we do not seek dual coverage, just full coverage. We think that Burnett and Katherine should each separately have \$500,000 coverage for their share of their LSM loss

Accordingly, it is respectfully requested that in the event LSM prevails on final appeal, a hearing be set on this OPPOSITION to Trustee's DETERMINATION OF CLAIM, and that after hearing this matter the Court sustain the Opposition and declare Claimant to be a customer of BLMIS per SIPA entitled to the full \$500,000.00 coverage. On the other hand, if CICO prevails on final appeal, it is requested that this OPPOSITION be withdrawn.

Respectfully submitted this 15<sup>th</sup> day of November, 2010.

  
BURNETT H RADOSH  
Claimant

(407) 394-5869

3 June 1993

Bernard L. Madoff Investment Securities  
Attn: Annette Bongiorno  
885 Third Avenue  
New York, NY 10022

Dear Ms. Bongiorno,

Wendy Bodner, the CPA working on Dad's estate taxes, told me today that she called you for some information and that you requested a copy of Dad's death certificate. Here's the certificate.

I'm sorry I didn't tell you of Dad's death myself. But when I called your office soon after the event, you were away for an extended period, it seemed, and I ended up speaking to your staff at length and, ultimately, to Mr. Madoff.

To make a long story short, the grandchildren who are each receiving 10% of the Radosh Trust, Alaric, Jeremy, Lee, and Laura, all wanted to continue with the Madoff investment but individually did not have the requisite \$100,000 and, anyway, no new accounts were being opened. Mr. Madoff suggested that all get together in an investment club, and that the old Radosh Trust account assets could be transferred as appropriate. With my brother, Ed, and I joining in, we six beneficiaries of the Radosh Trust have formed Radosh Partners. Our new Tax ID is enclosed.

As of yet, I have not obtained Florida fictitious name registration which is a prerequisite for opening up a bank account here in the name of Radosh Partners. Moreover, we have not yet drawn up any formal documents governing Radosh Partners, and I suppose we ought to do that and will do it soon. So thus far we have not yet requested that anything be done to the Radosh Trust account.

One further complication is that I am the Trustee for Lee and Laura's shares of the Radosh Trust until each becomes 25 years old. (Based on the Radosh Trust documents which, I believe, you have. There are no other documents describing these trusteeships.) I haven't yet learned whether I also need to get tax ID's for those two "trusts" when the only investment those trusts will make is in Radosh Partners/ Madoff.

The reason I am telling you this now is that you requested the death certificate and I didn't know if this meant you were planning to do anything with the Radosh Trust account, such as close it out and send me a check for the proceeds. We certainly wouldn't want you to do this. If you must close out the Radosh Trust account soon, please simply open up the new account in the name of Radosh Partners and transfer the assets, if you can.

Please let me know if there are any problems or if there is any further information that I can give you. If you telephone and only get my answering machine, in addition to leaving a message you could try our cellular, (407) 265-9502.

Thanks for your help. Best wishes,

Burnett H. Radosh

Copies to Ed, Alaric, Jeremy, Lee, and Laura Radosh

*Burnett H. Radosh, Trustee Incl'*

Radosh Partners  
P.O. Box 6568  
Deerfield Beach, FL 33442-6568  
Telephone: (407) 394-5869  
Fax: (407) 347-1587 (please put "Radosh" on cover sheet)

4 Feb 94

Bernard L. Madoff Investment Securities  
Attn: Mr. Frank DePascale  
885 Third Avenue  
New York, NY 10022

Dear Mr. DePascale:

Re: 1-R0090-3-0  
Radosh Partners

I hope I have spelled your name correctly (based on our phone calls). If not, please let me know the correct spelling. Thank you.

I am sending this by FAX and US Mail.

One of our partners has an immediate requirement for funds. Kindly disburse thirty four thousand dollars (\$34,000.) as soon as possible. We understand that the processing time will possibly be ten days or so, plus or minus.

If there is any problem, or if the processing is to take more than ten days, please let me know.

We expect the check to be made to "Radosh Partners" and mailed to me.

Thank you.

Sincerely,

Burnett H. Radosh  
General Partner

COPY

Incl 2

**RADOSH PARTNERS**  
**2533 NE 26th Ave.**  
**Lighthouse Point, FL 33064**  
**(305)781-1228**  
**(305)675-3862 (Cellular)**

January 6, 1995

Bernard L. Madoff Investment Securities  
Attn: Annette Bongiorno  
885 Third Avenue  
NY, NY 10022

Dear Ms. Bongiorno

**Re: Account # 1-R0090-3-0**  
**Radosh Partners**

Kindly send us a check for \$12,000 (twelve thousand dollars). One of our partners is facing a large tuition requirement.

This request will be sent by FAX and by US Mail. Because the FAX originates in our computer which does not have a scanner, there will be no signature on the FAX copy.

w

Many thanks.

Yours truly,

Burnett H. Radosh  
General Partner

Incl 3

Radosh Partners

Radosh Partners

Radosh Partners

2533 NE 26 AVENUE  
LIGHHOUSE POINT, FL 33064  
(954) 781-1228 (Home)  
(954) 612-0509(Cellular)

7 September 2005

Radosh Partners Letter #125

Dear Radosh Partner:

June 2005 Madoff Results. Your gain was \$ \_\_\_\_\_.

Transactions Effective July 1st, 2005. There were two transfers.  
(This does not affect you.) (As a result, your share was (increased) (decreased) by  
\$ \_\_\_\_\_.)

July 2005 Madoff Results. Your gain was \$ \_\_\_\_\_.

Transactions Effective August 1<sup>st</sup>, 2005. There was one transfer. (This does not affect you). (As  
a result, your share was (increased)(decreased) by \$ \_\_\_\_\_.)

August 2005 Madoff Results. Your gain was \$ \_\_\_\_\_.

Your new Bottom Line as of August 31st is \$ \_\_\_\_\_.

Transactions Effective September 1<sup>st</sup>, 2005. There were three withdrawals. (This does not  
affect you.) (As a result, your share was decreased by \$ \_\_\_\_\_, the amount of your  
withdrawal, and this lowers your bottom line reported above to \$ \_\_\_\_\_  
as of Sep 1<sup>st</sup>.)

Warmest regards.

Burnett H. Radosh  
General Partner

Incl 4 p. 109

Radosh Partners

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2533 NE 26 AVENUE  
LIGHTHOUSE POINT, FL 33064  
(954) 781-1228 (Home)  
(954) 612-0509(Cellular)

7 September 2005

Radosh Partners Letter #125

TO: B + K

Dear Radosh Partner:

June 2005 Madoff Results. Your gain was \$ 7,316.87.

Transactions Effective July 1st, 2005. There were two transfers.  
(This does not affect you.) (As a result, your share was (increased) (decreased) by  
\$ 100.00.)

July 2005 Madoff Results. Your gain was \$ 2,825.50.

Transactions Effective August 1<sup>st</sup>, 2005. There was one transfer. (This does not affect you). (As  
a result, your share was (increased)(decreased) by \$ 30,000.00.)

August 2005 Madoff Results. Your gain was \$ 2,521.94.

Your new Bottom Line as of August 31st is \$ 895,165.83.

Transactions Effective September 1<sup>st</sup>, 2005. There were three withdrawals. (This does not  
affect you.) (As a result, your share was decreased by \$ 30,000.00 the amount of your  
withdrawal, and this lowers your bottom line reported above to \$ 865,165.83  
as of Sep 1<sup>st</sup>.)

Warmest regards,

Burnett H. Radosh  
General Partner

Incl 4 p. 2 D 9

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2533 NE 26 AVENUE  
LIGHTHOUSE POINT, FL 33064  
(954) 781-1228 (Home)  
(954) 612-0509(Cellular)

7 September 2005

Radosh Partners Letter #125

D. CARP

Dear Radosh Partner:

June 2005 Madoff Results. Your gain was \$ 24.89.

Transactions Effective July 1st, 2005. There were two transfers.  
(This does not affect you.) (As a result, your share was (increased) (decreased) by  
\$ \_\_\_\_\_).

July 2005 Madoff Results. Your gain was \$ 9.61.

Transactions Effective August 1<sup>st</sup>, 2005. There was one transfer. (This does not affect you). (As  
a result, your share was (increased) (decreased) by \$ \_\_\_\_\_).

August 2005 Madoff Results. Your gain was \$ 8.29.

Your new Bottom Line as of August 31st is \$ 2,942.13.

Transactions Effective September 1<sup>st</sup>, 2005. There were three withdrawals. (This does not  
affect you.) (As a result, your share was decreased by \$ \_\_\_\_\_, the amount of your  
withdrawal, and this lowers your bottom line reported above to \$ \_\_\_\_\_  
as of Sep 1<sup>st</sup>.)

Warmest regards,

Burnett H. Radosh  
General Partner

Incl 4 p. 3 of 9

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LIGHTHOUSE POINT, FL 33064  
(954) 781-1228 (Home)  
(954) 612-0509(Cellular)

7 September 2005

Radosh Partners Letter #125

TO: Alanic

Dear Radosh Partner:

June 2005 Madoff Results. Your gain was \$ 3,022.34.

Transactions Effective July 1st, 2005. There were two transfers.  
(This does not affect you.) (As a result, your share was (increased) (decreased) by  
\$ \_\_\_\_\_).

July 2005 Madoff Results. Your gain was \$ 1,167.27.

Transactions Effective August 1<sup>st</sup>, 2005. There was one transfer. (This does not affect you). (As  
a result, your share was (increased)(decreased) by \$ 30,000.00 ).

August 2005 Madoff Results. Your gain was \$ 922.15.

Your new Bottom Line as of August 31st is \$ 327,290.83.

Transactions Effective September 1<sup>st</sup>, 2005. There were three withdrawals. (This does not  
affect you.) (As a result, your share was decreased by \$ 20,000.00 the amount of your  
withdrawal, and this lowers your bottom line reported above to \$ 307,290.83  
as of Sep 1<sup>st</sup>.)

Warmest regards,

*Lewie Dad*

Burnett H. Radosh  
General Partner

Incl 4 p. 4 of 9

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LIGHTHOUSE POINT, FL 33064  
(954) 781-1228 (Home)  
(954) 612-0509(Cellular)

7 September 2005

Radosh Partners Letter #125

TO: Jeremy

Dear Radosh Partner:

June 2005 Madoff Results. Your gain was \$ 3,716.37.

Transactions Effective July 1st, 2005. There were two transfers.  
(This does not affect you.) (As a result, your share was (increased) (decreased) by  
\$ 50.00.)

July 2005 Madoff Results. Your gain was \$ 1,435.12.

Transactions Effective August 1<sup>st</sup>, 2005. There was one transfer. (This does not affect you). (As  
a result, your share was (increased) (decreased) by \$ \_\_\_\_\_.)

August 2005 Madoff Results. Your gain was \$ 1,237.92.

Your new Bottom Line as of August 31st is \$ 439,390.62.

Transactions Effective September 1<sup>st</sup>, 2005. There were three withdrawals. (This does not  
affect you.) (As a result, your share was decreased by \$ 20,000.00 the amount of your  
withdrawal, and this lowers your bottom line reported above to \$ 419,390.62  
as of Sep 1<sup>st</sup>.)

Warmest regards,

Lov, Dad.

Burnett H. Radosh  
General Partner

Incl # p. 589

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2533 NE 26 AVENUE  
LIGHTHOUSE POINT, FL 33064  
(954) 781-1228 (Home)  
(954) 612-0509(Cellular)

7 September 2005

Radosh Partners Letter #125

TO: Lee

Dear Radosh Partner:

June 2005 Madoff Results. Your gain was \$ 1,147.28.

Transactions Effective July 1st, 2005. There were two transfers.  
(This does not affect you.) (As a result, your share was (increased) (decreased) by  
\$ \_\_\_\_\_).

July 2005 Madoff Results. Your gain was \$ 443.09.

Transactions Effective August 1<sup>st</sup>, 2005. There was one transfer. (This does not affect you). (As  
a result, your share was (increased) (decreased) by \$ \_\_\_\_\_.)

August 2005 Madoff Results. Your gain was \$ 382.21.

Your new Bottom Line as of August 31st is \$ 135,659.81!

Transactions Effective September 1<sup>st</sup>, 2005. There were three withdrawals. (This does not  
affect you.) (As a result, your share was decreased by \$ \_\_\_\_\_, the amount of your  
withdrawal, and this lowers your bottom line reported above to \$ \_\_\_\_\_  
as of Sep 1<sup>st</sup>.)

Warmest regards,

*Love, Andre G*

Burnett H. Radosh  
General Partner

*Inc/4 p. 6 9/9*

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2533 NE 26 AVENUE  
LIGHTHOUSE POINT, FL 33064  
(954) 781-1228 (Home)  
(954) 612-0509(Cellular)

7 September 2005

Radosh Partners Letter #125

TO: Laura

Dear Radosh Partner:

June 2005 Madoff Results. Your gain was \$ 22.03.

Transactions Effective July 1st, 2005. There were two transfers.  
(This does not affect you.) (As a result, your share was (increased) (decreased) by  
\$)

July 2005 Madoff Results. Your gain was \$ 8.50.

Transactions Effective August 1<sup>st</sup>, 2005. There was one transfer. (This does not affect you). (As  
a result, your share was (increased)(decreased) by \$ \_\_\_\_\_.)

August 2005 Madoff Results. Your gain was \$ 7.34.

Your new Bottom Line as of August 31st is \$ 2,604.62.

Transactions Effective September 1<sup>st</sup>, 2005. There were three withdrawals. (This does not  
affect you.) (As a result, your share was decreased by \$ \_\_\_\_\_ the amount of your  
withdrawal, and this lowers your bottom line reported above to \$ \_\_\_\_\_  
as of Sep 1<sup>st</sup>.)

Warmest regards,

*Love, Uncle B*

Burnett H. Radosh  
General Partner

Incl 4 p. 7 of 9

Radosh Partners

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Radosh Partners

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LIGHTHOUSE POINT, FL 33064  
(954) 781-1228 (Home)  
(954) 612-0509 (Cellular)

7 September 2005

To: Rachel

Radosh Partners Letter #125

Dear Radosh Partner:

June 2005 Madoff Results. Your gain was \$ 36.43.

Transactions Effective July 1st, 2005. There were two transfers.  
(This does not affect you.) (As a result, your share was (increased) (decreased) by  
\$ 150.00 \*

July 2005 Madoff Results. Your gain was \$ 14.66.

Transactions Effective August 1<sup>st</sup>, 2005. There was one transfer. (This does not affect you). (As  
a result, your share was (increased) (decreased) by \$ \_\_\_\_\_).

August 2005 Madoff Results. Your gain was \$ 12.56.

Your new Bottom Line as of August 31st is \$ 4,459.45.

Transactions Effective September 1<sup>st</sup>, 2005. There were three withdrawals. (This does not  
affect you.) (As a result, your share was decreased by \$ \_\_\_\_\_, the amount of your  
withdrawal and this lowers your bottom line reported above to \$ \_\_\_\_\_  
as of Sep 1<sup>st</sup>.)

Warmest regards,

Love, Burnett  
Burnett H. Radosh

General Partner

\* Happy Birthday  
gift from Aunt  
Kathy, Uncle Burnie  
& Jeremy.

Incl 4 p 39

Radosh Partners

Radosh Partners

Radosh Partners

2533 NE 26 AVENUE  
LIGHTHOUSE POINT, FL 33064  
(954) 781-1228 (Home)  
(954) 612-0509(Cellular)

7 September 2005

Radosh Partners Letter #125

TO: Danielle

Dear Radosh Partner:

June 2005 Madoff Results. Your gain was \$ 26.54.

Transactions Effective July 1st, 2005. There were two transfers.  
(This does not affect you.) (As a result, your share was (increased) (decreased) by  
\$ \_\_\_\_\_.)

July 2005 Madoff Results. Your gain was \$ 10.25.

Transactions Effective August 1<sup>st</sup>, 2005. There was one transfer. (This does not affect you). (As a result, your share was (increased) (decreased) by \$ \_\_\_\_\_.)

August 2005 Madoff Results. Your gain was \$ 8.84.

Your new Bottom Line as of August 31st is \$ 3,138.22.

Transactions Effective September 1<sup>st</sup>, 2005. There were three withdrawals. (This does not affect you.) (As a result, your share was decreased by \$ \_\_\_\_\_ the amount of your withdrawal, and this lowers your bottom line reported above to \$ \_\_\_\_\_ as of Sep 1<sup>st</sup>.)

Warmest regards,

*Love, Uncle Burnie*

Burnett H. Radosh  
General Partner

Incl 4 p. 999



**Radosh Partners**

2533 NE 26 AVENUE  
LIGHTHOUSE POINT, FL 33064  
(954) 781-1228 (Home)  
(954) 803-6951 (Cellular)

January 7, 2000

Radosh Partners Letter #76

TO:

Dear Radosh Partner :

As forecast, there was no letter in December dedicated to the November results. This letter covers two months.

*Withdrawals effective November 1<sup>st</sup>.* Two partners made withdrawals effective November 1<sup>st</sup>. This (does not affect you) (results in your share being decreased by \$ \_\_\_\_\_ which is the amount of your withdrawal).

*Withdrawals effective January 1<sup>st</sup>, 2000* will appear in the next letter.

*November 1999 Results.* From the Madoff end-of-month report for November we compute that your share increased by \$ \_\_\_\_\_. Your bottom line became \$ \_\_\_\_\_.

*December 1999 Results.* From the Madoff end-of-month report for December we compute that your share increased by \$ \_\_\_\_\_. Your new bottom line is \$ \_\_\_\_\_.

Warmest regards,

Burnett H. Radosh  
General Partner

Incl 5

Radosh Partners  
Radosh Partners  
Radosh Partners

2533 NE 26 AVENUE  
LIGHTHOUSE POINT, FL 33064  
(954) 781-1228 (Home)  
(954) 612-0509 (Cellular)

November 7, 2001

Radosh Partners Letter #96

TO:

Dear Radosh Partner :

Transactions Effective October 1<sup>st</sup> Four withdrawals. These were, however, already reported in Letter #95.

October 2001 Results. From the Madoff end-of-month report for October we compute that your share increased by \$ \_\_\_\_\_. Your new bottom line is \$ \_\_\_\_\_.

Reminder. The following, re-printed from Letter# 7, 18 Feb 94, is still pertinent:

"INVESTMENT STRATEGY. Remember, also, that each partner is responsible for his/her own investment decisions, including whether to stay, in whole or in part, with Madoff. That is, if you don't want your eggs in the Madoff basket, you can withdraw them from the partnership. So far the Madoff results have been quite satisfactory (in my untutored opinion) and Kathy and I are not considering any change in our personal strategy. But it bears repeating that you must make your own decisions for your own funds...."

What brought this to mind is the horrible thought that flitted through my head: What would have happened to Radosh Partners if the Madoff offices had been in the World Trade Towers?

Planning Ahead. If I were to die or become mentally disabled, Kathy could easily take over the chores of General Partner. She already does most of the annual tax stuff which is harder than what I do. (Kathy, as you know from Letter# 5, 7 Dec 93, is a joint owner with right of survival of our share of the Partnership.) But if Kathy and I were both to become unavailable or unwilling, presumably many, many years down the road, it would be time for the new generation to take over. Jeremy is my nominee. His academic training in math, and his computer savvy, will enable him to do the job easily. A good work ethic, and plenty of space at home for files and stuff. Moreover, he has a substantial investment in RP. I solicit your concurrence, comments and/or other nominations. E-mail or US Mail, please, as it will become a matter of partnership record. In due course I will prepare appropriate documentation for us, for Bank of America, and for Madoff.

Incl 6 p. 182

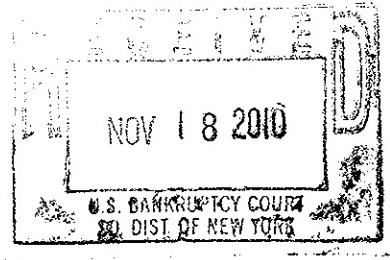
Written Partnership Agreement. Incidentally, as you know, we still do not have a single-document, formal, signed "partnership agreement". We haven't seemed to need one, but it is something I think about from time to time. The series of RP Letters seems to suffice. We only "invest" in one "investment", so we don't need any agreed rules about choosing investments. Partners can withdraw and/or deposit freely without restriction, subject to a minimum \$3,000 per transaction unless I can bootstrap it to another, since I don't want to burden Madoff with what is to them very trivial sums, and I want to minimize our tax accounting. My bookkeeping practices have been simple. Withdrawals are effective on the 1<sup>st</sup> day of the month in which withdrawn. (This was first explicated in Letter #10, 13 Sep 94). Deposits are effective on the day of deposit. On the effective day of one or more withdrawals or deposits, the shares of all partners are recomputed (you see this in the annual tax returns, except in the annual returns each percentage is rounded off to two decimal places, but in our books I compute the percentages to five (!) decimal places. Anyway, I haven't thought that any of this stuff needs to be in a "partnership agreement." There's a lot of information about family investment clubs on the web, however, and Kathy and I will take a look at this. Perhaps we'll think we should become more formal. Any thoughts?

Warmest regards,

Burnett H. Radosh  
General Partner

Incl 6 p. 2 of 2

RADOSH PARTNERS  
2533 NE 26 Avenue  
Lighthouse Point, FL 33064



RE: Bernard L. Madoff Investment Securities LLC, in Liquidation  
December 11, 2008

Oppositions to Trustee's Determination in Claims 014896 - 8

Irving H. Picard, Trustee  
c/o Baker & Hostetler LLP  
Attn: Claims Department  
45 Rockefeller Plaza  
New York, NY 10111

And

Clerk of the US Bankruptcy Court for the SDNY  
One Bowling Green  
New York, NY 10004

Greetings:

Filed herewith are three separate Oppositions of individual Radosh Partner (RP) owners Burnett and Katherine Radosh, Claims # -014896, 014897 and 014898.

It is likely that some, if not all, of the other RP adult owners (Alaric, Jeremy, Lee, Laura) will also file Oppositions to the denial of their claims.

It is the position of RP that the Trustee should recognize the individual owners as the true Madoff customers and not reject them on the grounds that they do not have an account with BLMIS. Consistent with this, RP agrees that if the Trustee recognizes the individual owners as the BLMIS customers, it should not also recognize RP. We do not seek dual coverage, just full coverage.

Please note that the attachments are found only in the Opposition for 014898, Burnett Radosh. All other Oppositions simply refer to 014898 for the attachments. This was done to minimize paperwork, but if you do require separate attachments in each file, we will gladly provide them on request.

Respectfully,

*Radosh Partners by Burnett H Radosh*  
RADOSH PARTNERS  
By Burnett H Radosh  
15 NOV 10